

# Exhibit 1

**A. Interpretation of Terms in Section 2**

Section 2 of the Data Access Law provides that:

motor vehicle owners' and independent repair facilities' access to vehicle onboard diagnostic systems shall be standardized and not require any authorization by the manufacturer, directly or indirectly, unless that authorization system for access to vehicle networks and their on-board diagnostic systems is standardized across all makes and models sold in the Commonwealth and is administered by an entity unaffiliated with a manufacturer.

G.L. c. 93K, § 2(d)(1).

**1. "Motor vehicle"**

- Attorney General's position: The term "motor vehicle" means any "vehicle, originally manufactured for distribution and sale in the United States, driven or drawn by mechanical power and manufactured primarily for use on public streets, roads and highways," with certain exceptions set forth in Mass. G.L. c. 93K, § 1. This definition includes cars powered by internal combustion engines and electric cars.
- AAI's position:

**2. "Authorization"**

- Attorney General's position: The term "authorization" means an actor's role or what it is and is not permitted to do on a system. Authorization is distinct from authentication, which refers to the confirmation of the identity of an individual, user, or other actor.
- AAI's position:

**3. "Access to vehicle networks and their onboard diagnostic systems"**

- Attorney General's position: The term "access to vehicle networks and their onboard diagnostic systems" means access for obtaining data related to the purposes of diagnosis, repair, and maintenance.
- AAI's position:

**4. “An entity unaffiliated with a manufacturer”**

- Attorney General’s position: The term “entity unaffiliated with a manufacturer” means an entity that does not have a formal corporate affiliation with an OEM or is subject to an OEM’s direct or indirect control.
- AAI’s position:

**B. Interpretation of Terms in Section 3**

Section 3 of the Data Access Law provides that:

[c]ommencing in model year 2022 and thereafter a manufacturer of motor vehicles sold in the Commonwealth . . . that utilizes a telematics system shall be required to equip such vehicles with an inter-operable, standardized and open access platform across all of the manufacturer’s makes and models. Such platform shall be capable of securely communicating all mechanical data emanating directly from the motor vehicle via direct data connection to the platform. Such platform shall be directly accessible by the owner of the vehicle through a mobile-based application and, upon the authorization of the vehicle owner, all mechanical data shall be directly accessible by [both independent mechanics and dealerships] limited to the time to complete the repair or for a period of time agreed to by the vehicle owner for the purposes of maintaining, diagnosing and repairing the motor vehicle. Access shall include the ability to send commands to in-vehicle components if needed for purposes of maintenance, diagnostics and repair.

Mass. G.L. c. 93K, § 2(f).

**1. “Telematics system”**

- Attorney General’s position: The term “telematics system” means any “any system in a motor vehicle that collects information generated by the operation of the vehicle and transmits such information . . . utilizing wireless communications to a remote receiving point where it is stored.”
- AAI’s position:

**2. “Mechanical data”**

- Attorney General’s position: The term “mechanical data” means any “any vehicle-specific data, including telematics system data, generated, stored in or transmitted by a motor vehicle used for or otherwise related to the diagnosis, repair or maintenance of the vehicle.”

- AAI's position:

### **3. "Platform"**

- Attorney General's position: The term "platform" means the vehicle architecture and associated software and features.
- AAI's position:

### **4. "Interoperable"**

- Attorney General's position: The term "interoperable" means a standard way to connect and communicate with the vehicle. An interoperable device is one that can be used regardless of the manufacturer.
- AAI's position:

### **5. "Standardized"**

- Attorney General's position: The term "standardized" means following a common and well documented method to perform the necessary actions such that there is a common, agreed upon way of communicating.
- AAI's position:

### **6. "Open access"**

- Attorney General's position: The term "open access" means having a non-gated way to gain access to the data and capabilities. An open access platform and the mechanical data it communicates with are freely accessible to the owner, without the OEM acting as a gatekeeper.
- AAI's position:

### **7. "Directly accessible"**

- Attorney General's position: The term "directly accessible" means that the consumer will not need to go through the OEM to perform diagnosis, maintenance, and repairs.

- AAI's position:

**8. “Securely communicating”**

- Attorney General's position: The term “security communicating” means communication in a way that authenticates the identities of the recipient and the sender, where the communication is not made known to parties other than the recipient and the sender and the integrity of the communication is not compromised.
- AAI's position:

**9. “Ability to send commands to in-vehicle components if needed for purposes of maintenance, diagnostics and repair”**

- Attorney General's position: The term “ability to send commands to in-vehicle components if needed for purposes of maintenance, diagnostics and repair” means the ability to write diagnostic data to vehicle ECUs, and to transmit packets to the ECU, if necessary for the maintenance, diagnosis, or repair of a vehicle.
- AAI's position: